

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2021 SEP 14 PM 1:33

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CARLOS MANUEL RODRIGUEZ BRIME,

Defendant.

CASE NO. 2:21-cr-171

JUDGE SARGUS

INDICTMENT

18 U. S. C. § 248(a)(1)

18 U. S. C. § 875(c)

18 U. S. C. § 844(e)

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

**THE GRAND JURY CHARGES:**

At all times relevant to this Indictment:

1. The defendant, **CARLOS MANUEL RODRIGUEZ BRIME ("BRIME")**, resided in Columbus, Ohio, within the Southern District of Ohio.
2. Your Choice Healthcare ("YCH") is a medical facility based in the United States, specifically Columbus, Ohio, that provides reproductive healthcare services, including abortion services. YCH maintains a website which clearly identifies the services it provides.
3. YCH is owned and operated by R.R., and has five employees. R.R. answered all telephone calls that were received by YCH on April 11, 2021.

**COUNT ONE**

1. The factual allegations contained in Paragraphs 1 through 3 of the Indictment are re-alleged and full incorporated by reference herein.
2. On or about April 11, 2021, in the Southern District of Ohio, the defendant, **CARLOS MANUEL RODRIGUEZ BRIME**, by threat of force, intentionally intimidated and

interfered with, and attempted to intimidate and interfere with R.R. and the employees of YCH, because YCH was and had been providing reproductive health services, and in order to intimidate R.R. and the employees of YCH from providing reproductive health services.

**All in violation of Title 18, United States Code, Section 248 (a)(1).**

**COUNT TWO**

3. The factual allegations contained in Paragraphs 1 through 3 of the Indictment are re-alleged and fully incorporated by reference herein.

4. On or about April 11, 2021, in the Southern District of Ohio, and elsewhere, the defendant, **CARLOS MANUEL RODRIGUEZ BRIME**, knowingly transmitted in interstate and foreign commerce, a telephonic communication, which contained a threat to injure another person, to wit: **BRIME** contacted YCH by telephone, indicated his belief that his girlfriend was a patient at YCH, and indicated that he would kill her if she killed his baby.

**All in violation of Title 18, United States Code, Section 875 (c).**

**COUNT THREE**

5. The factual allegations contained in Paragraphs 1 through 3 of the Indictment are re-alleged and fully incorporated by reference herein.

6. On or about April 11, 2021, in the Southern District of Ohio, and elsewhere, the defendant, **CARLOS MANUEL RODRIGUEZ BRIME**, through the use of a telephone, willfully made threats, and maliciously conveyed false information knowing the same to be false, concerning an attempt and alleged attempt being made, and to be made, to kill, injure, and intimidate any individual and to unlawfully damage and destroy a building by means of fire and explosive.

**All in violation of Title 18, United States Code, Section 844(e).**

A TRUE BILL.

*s/ Foreperson*

GRAND JURY FOREPERSON

VIPAL J. PATEL  
ACTING UNITED STATES ATTORNEY

*s/*

EMILY CZERNIEJEWSKI (IL 6308829)

Assistant United States Attorney

*s/*

SANJAY PATEL (IL 6272840)

Trial Attorney